

JEFFREY L. HARTMAN  
 Nevada Bar No. 1607  
 HARTMAN & HARTMAN  
 510 W. Plumb Lane, Suite B  
 Reno, NV 89509  
 Telephone: (775) 324-2800  
 Fax: (775) 324-1818  
 notices@bankruptcyreno.com  
 Attorney for Christina Lovato, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

In re

DOUBLE JUMP, INC.

Debtor.

Lead Case No.: BK-19-50102-btb  
 Chapter 7

In Joint Administration with:

19-50103-btb	Dora Dog Properties, LLC
19-50104-btb	Dog Blue Properties, LLC
19-50105-btb	Brandy Boy Properties, LLC
19-50106-btb	475 Channel Road, LLC
19-50108-btb	Park Road, LLC
19-50109-btb	140 Mason Circle, LLC
19-50130-btb	DC Solar Solutions, Inc.
19-50131-btb	DC Solar Distribution, Inc.
19-50135-btb	DC Solar Freedom, Inc.

☐ Affects ALL Debtors  
☒ Affects Double Jump, Inc.  
☐ Affects Dora Dog Properties, LLC  
☐ Affects Dog Blue Properties, LLC  
☐ Affects Brandy Boy Properties, LLC  
☐ Affects 475 Channel Road, LLC  
☐ Affects Park Road, LLC  
☐ Affects 140 Mason Circle, LLC  
☒ Affects DC Solar Solutions, Inc.  
☒ Affects DC Solar Distribution, Inc.  
☒ Affects DC Solar Freedom, Inc.

**TRUSTEE'S MOTION FOR ENTRY OF  
 ORDER CONTINUING RETENTION OF  
 GLASSRATNER ADVISORY & CAPITAL  
 GROUP LLC AND SETH FREEMAN TO  
 PROVIDE POST CONVERSION  
 SERVICES TO CHAPTER 7 TRUSTEE**

Hearing Date: OST Requested  
 Hearing Time: OST Requested

Christina Lovato, chapter 7 trustee ("Trustee"), for the jointly administered estates of Double Jump, Inc., DC Solar Solutions, Inc., DC Solar Distribution Inc., and DC Solar Freedom, Inc. ("Double Jump Estates"), hereby submits her Motion (the "Motion") for entry of an Order Continuing Retention of GlassRatner Advisory & Capital Group, LLC ("GlassRatner"), and Seth Freeman ("Mr. Freeman"), to provide post-conversion services to the Double Jump Estates, effective as of March 22, 2019. This Motion is made and based upon the following memorandum of

1 points and authorities and § 327(a). The Trustee also requests the Court take judicial notice of the  
2 papers and pleadings on file in these jointly administered cases.

3 **MEMORANDUM OF POINTS AND AUTHORITIES**

4 **I.**

5 **RELIEF REQUESTED**

6 1. By this Motion, the Trustee requests entry of an order pursuant to § 327(a)  
7 authorizing the continuing retention, of GlassRatner and Seth Freeman, effective as of March 22,  
8 2019, to provide the Double Jump Estates with necessary services, as more particularly described  
9 below, to enable the Trustee to perform her duties as set forth in § 704.

10 **II.**

11 **JURISDICTION AND VENUE**

12 2. This Court has jurisdiction to consider this Application pursuant to 28 U.S.C. §§  
13 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

14 3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

15 4. The statutory predicate for the relief requested is § 327(a), together with  
16 F.R.Bankr.P. 2014(a) and 2016. The Trustee also requests application of § 105 to the extent  
17 necessary.

18 **III.**

19 **RELEVANT BACKGROUND**

20 5. On January 30, 2019 (the "Petition Date"), Double Jump, Inc. filed a chapter 11  
21 petition and on February 3, 4 and 5, 2019, respectively, DC Solar Solutions, Inc., DC Solar  
22 Distributions, Inc. and DC Solar Freedom, Inc., each, filed chapter 11 petitions. On January 30,  
23 2019, six related entities also filed chapter 11 petitions: Dora Dog Properties, LLC, Dog Blue  
24 Properties, LLC, Brandy Boy Properties, LLC, 475 Channel Road LLC, Park Road, LLC and  
25 Mason Circle LLC. The ten chapter 11 cases are being jointly administered by Order entered  
26 February 12, 2019. **DE 97.**

27 6. On February 4, 2019, the Debtors, with the exception of DC Solar Freedom, Inc.,  
28 filed their Emergency Motion Regarding Chapter 11 First Day Motions for Entry of Interim and

1 Final Orders (i) Authorizing the Retention of GlassRatner Advisory & Capital Group, LLC to  
2 Provide Chief Restructuring Officer and Certain Additional Personnel, (ii) Designating Seth  
3 Freeman as Debtors Chief Restructuring Officer Effective as of the Petition Date, (iii) Setting a  
4 Final Hearing, and (iv) Granting Related Relief with Proposed Order (“GlassRatner Retention  
5 Motion”). **DE 17.** The GlassRatner Motion was supported by the separately filed Declaration of  
6 Seth Freeman (“Freeman Declaration”). **DE 18.** It is important to note that employment of  
7 GlassRatner was sought under §§ 363 and 105.

8         7. On February 19, 2019, the Court entered its Interim Order regarding the  
9 GlassRatner Retention Motion. **DE 128.** That Order provided for retention of GlassRatner on an  
10 interim basis for 60 days with a final hearing to be held on March 8, 2019. Mr. Freeman was  
11 appointed as the Responsible Person to act on behalf of the Debtors and was to have sole control  
12 over estate funds, including cash, checks and bank accounts.

13         8. On March 4, 2019, Double Jump, Inc. filed its Schedules of Assets and Liabilities  
14 (“Schedules”), **DE 261**, and Statement of Financial Affairs (“Statement”), **DE 262**. Mr. Freeman  
15 signed the Schedules and Statement for Double Jump, Inc. The only assets disclosed by Double  
16 Jump, Inc. are the equity interests in DC Solar Solutions and DC Solar Distribution.

17         9. On March 14, 2019, the Court entered its Final Order authorizing the retention of  
18 GlassRatner. **DE 350.**

19         10. On March 22, 2019 (“Conversion Date”), the Court entered an Order converting all  
20 of the chapter 11 cases to chapter 7. Trustee Lovato was appointed to administer the Double Jump  
21 estate and the three DC Solar estates. Chapter 7 Trustee W. Donald Gieseke was appointed to  
22 administer the other six estates.

23         11. As of the Conversion Date, Schedules and Statements for DC Solar Solutions, DC  
24 Solar Distribution and DC Solar Freedom had not been filed.

25         12. As a result of the lack of Schedules and Statements, Trustee Lovato has been, and  
26 continues to be, at a significant disadvantage in her efforts to administer the Double Jump Estates.  
27 It is only as a result of multiple daily phone calls and e-mails that the Trustee and her counsel learn  
28 of issues which need to be addressed on an urgent basis. For example, the Trustee believes there

1 may are at least 26 leases of real property in locations around the United States to which one or  
2 more of the Double Jump Estates may be a party and, as a result, raises issues about obligations  
3 under § 365 and accruing post-petition rent which are entitled to administrative expense priority.

4 13. In addition, because of his intimate involvement with all of the Debtors prior to  
5 January 30, 2019, and his involvement with the Debtors from the Petition Date to the Conversion  
6 Date, Mr. Freeman's knowledge about the Debtors' business affairs is crucial to the Trustee's  
7 efforts to fulfill her duties and responsibilities under § 704.

8 14. As set forth in the Freeman Declaration, prior to the bankruptcy filing, GlassRatner  
9 received total funds of \$375,000 from the Debtors. For services rendered by GlassRatner prior to  
10 the petitions GlassRatner charged the sum of \$83,911.94, which sum was "drawn down" from the  
11 retainer funds, leaving a retainer on hand of \$291,088.06. GlassRatner will file an application for  
12 an order to apply its remaining retainer to services rendered and expenses incurred subsequent to  
13 the Petition Date and prior to the conversion date.

14 15. The Trustee is mindful of the fact that the post-petition, pre-conversion period for  
15 professionals entitled to fees and costs are subject to the operation of § 726. Under the  
16 circumstances, and due to the imperative of completing Schedules and Statements, in addition to  
17 the other services the Trustee will request of GlassRatner for post-conversion assistance, the  
18 Trustee will ask the Court to allow application by GlassRatner of its unapplied retainer to fees and  
19 costs approved by the Court for the post-petition, pre-conversion period with the understanding  
20 that the fees and costs may be subject to disgorgement; GlassRatner, however, reserving all its  
21 defenses with regard to pre-conversion services and payments.

#### 22 IV.

#### 23 SCOPE OF EMPLOYMENT

24 16. Trustee Lovato asked Mr. Freeman to outline, subject to Court approval, the scope  
25 of work necessary to complete the Schedules and Statements for DC Solar Solutions, DC Solar  
26 Distributions and DC Solar Freedom. Attached hereto as **Exhibit A** is Mr. Freeman's response.  
27 The fee estimate for completion for Trustee Lovato's cases is \$22,870 and the time estimate is 10  
28 days. In addition, due to his knowledge of the various Debtors' operations, the Trustee intends to

1 utilize the services of Mr. Freeman, and, as required, the services of GlassRatner to assist in  
2 identifying additional assets, potential claims for recovery of assets and other services the Trustee  
3 deems necessary and appropriate to assist her in administration of these cases. Of course,  
4 periodically GlassRatner will file applications for approval and payment of fees and expenses  
5 incurred.

6 **V.**

7 **LEGAL AUTHORITY**

8 17. As noted, GlassRatner's prior employment was requested under §§ 363 and 105.

9 18. The request is made for the continued retention of GlassRatner as a professional  
10 person under § 327(a). The Trustee believes that GlassRatner is disinterested as defined by §  
11 101(14). GlassRatner is not a creditor, i.e., it does not hold a pre-petition claim against the  
12 Debtors. § 101(10)(A). Likewise, the Trustee believes that GlassRatner does not hold an interest  
13 adverse to the estate.

14 19. The Trustee also asserts that the economic terms of GlassRatner's retention are fair,  
15 reasonable, and beneficial to the Debtors' estates, and were negotiated at arm's-length. This is  
16 evident from the Court's prior approval of GlassRatner and Mr. Freeman.

17 20. For the reasons set forth herein, the Trustee submits that the continued retention of  
18 GlassRatner and Mr. Freeman is a sound exercise of the Trustee's business judgment and in the  
19 best interests of all parties in interest in these Chapter 7 Cases.

20 **VI.**

21 **CONCLUSION**

22 Based on the foregoing, the Trustee requests that the Court grant the Trustee's Motion for  
23 an Order Continuing the Retention of GlassRatner and Mr. Freeman on the terms and conditions set  
24 forth herein.

25 DATED: April 19, 2019.

26 HARTMAN & HARTMAN

27 /s/ Jeffrey L. Hartman

28 Jeffrey L. Hartman, Esq.

Proposed Attorney for Trustee